

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS
PRICING ANTITRUST LITIGATION

MDL 2724
16-MD-2724

THIS DOCUMENT RELATES TO:

ALL ACTIONS

HON. CYNTHIA M. RUGE

ORDER

AND NOW, this 7th day of June 2022, upon consideration of the attached Joint
Stipulation regarding the deposition of Renee Kenney, it is hereby **ORDERED** that the
Stipulation is **APPROVED**.

It is so **ORDERED**.

BY THE COURT:

/s/ Cynthia M. Rufe

CYNTHIA M. RUGE, J.

UNITED STATES DISTRICT COURT
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JOINT STIPULATION
(STIPULATED ORDER REGARDING THE DEPOSITION OF RENEE KENNEY)

WHEREAS, Plaintiffs in MDL 2724 requested dates for the deposition of Renee Kenney, former employee of Par Pharmaceutical Inc. (“Par”), in April 2022 pursuant to Pretrial Order No. 158 (Dkt. 1688);

WHEREAS, Par and Ms. Kenney prefer to proceed with the deposition in October 2022;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned counsel, on behalf of their respective clients, as follows:

1. The deposition of former Par Pharmaceutical, Inc. (“Par”) employee Renee Kenney shall take place in October 2022 or as soon as practicable thereafter.
2. In the event that Par or any of its direct or indirect parent companies, including Endo International plc, files for bankruptcy before Ms. Kenney’s deposition is completed, the parties agree that neither Par nor Ms. Kenney shall object to the deposition proceeding as previously scheduled on the basis of the bankruptcy.
3. Nothing in this Agreement shall require Par or Ms. Kenney to violate any stay order that may be entered in the bankruptcy proceeding. In the event that Par or Ms. Kenney has a good faith basis to believe that any order requires the stay of Ms. Kenney’s deposition, Par and

Ms. Kenney will join Plaintiffs' motion for relief from that order to allow Ms. Kenney's deposition to proceed.

4. Par's agreement not to object to Ms. Kenney's deposition on the basis of a bankruptcy filing is solely for the purpose of allowing the deposition of Ms. Kenney to proceed on the basis set forth herein and not for any other purpose with respect to the Generics Pricing litigation. This Agreement shall not be construed as a waiver by Par of any of its rights arising under any applicable laws relating to insolvency, bankruptcy, reorganization and other laws generally affecting the rights of creditors, including as such rights may relate to the Generics Pricing litigation, and all such rights are expressly reserved.

IT IS SO STIPULATED.

Dated: June 3, 2022

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